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November 2, 2022

Sent Via ECF:

Honorable Judge J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square, Room 2101
New York, NY 10007

Re: Almonte, et al. v. JAM Maintenance, LLC, et al.
Case No. 22-cv-01820-JPO

Honorable Judge Oetken:

I represent Defendants 1165 Gerard Realty LLC, 1170 Gerard Realty LLC, Beauty Realty LLC, Sagamore Realty LLC, Prospect 2000 Realty LLC (the "LLC Defendants"), Robert Kaszovitz and Akiva Kaszovitz (the "Individual Defendants") in connection with the above referenced action. I submit this letter to respectfully request that the deadline to answer or move be extended from November 7, 2022 to November 21, 2022.

By Letter Motions dated August 29, 2022, both counsel for Plaintiffs and the undersigned requested that the deadline to answer or move be extended. This Court extended the deadline to November 7, 2022. The Individual Defendants had not been served at the time of those requests and Plaintiffs were given additional time to serve.

Counsel for Co-Defendants Jam Maintenance LLC and Diego Ramirez has graciously consented to this request. Counsel for Plaintiffs have not consented to this request and instead conditioned their consent upon the Individual Defendants' waiver of jurisdictional/service of process issues. Since Plaintiffs did not serve the Individual Defendants by the September 16, 2022 deadline set by this Court, the Individual Defendants' wish to preserve and do not waive jurisdictional/service of process defenses.

Thank you in advance for your kind consideration in this matter.

Very truly yours,

/S/ DAVID BINSON

David Binson, Esq.

Cc. Pechman Law Group PLLC (Via Email and ECF)
Khan Law Group, PC (Via Email and ECF)